



March 12, 2024

Hon. Jennifer L. Rochon  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007


VIA ECF ONLY

Re: *Coker v Goldberg & Associates P.C.* 1:21-cv-1803-JLR-BCM  
OPPOSITION TO MOTION TO EXTEND TIME (DKT. 111)

Your Honor:

Given the history of this case, Plaintiff opposes Defendants' Motion to Extend Time to file their opposition to Plaintiff's Motion for Attorney Fees and Costs [Dkt. 111] on the following grounds.

1. Defendants filed their opposition to Plaintiff's Motion for Attorney Fees and Costs 8 days late, not 1 day as they stated. Plaintiff's Motion was filed 3/12/2024 [Dkt. 109]. 14 days thereafter was 3/26/2024. They filed their motion 4/3/2024 at the same time as their letter motion to extend. My firm has already sent in the courtesy copy of the motion to chambers, which we believed to have been in "fully briefed" state given the lack of response to the motion by the deadline
2. I responded to counsel's email seeking consent to their motion to extend within 4 hours of them sending it yesterday, indicating my opposition. They filed their letter motion after my email was sent, incorrectly indicating that I had not weighed in.
3. Defense counsel failed again to abide by the Court's individual practice standards regarding requests for extension of time. This is important not only in regard to the continued disregard for and/or oversight of such rules but also because doing so would have required them to provide a recitation of the many times over the course of this case they have sought extensions of time.
4. Their filing was incomplete. 7 substantive pages were filed, with the last page ending mid sentence and without a signature block.

 April 4, 2024

Page 2 of 2

5. The Court is more than capable of reviewing an attorney fee motion without Defendants' input.

Sincerely,



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